1 Jeffrey L. Hartman, Esq. Nevada Bar No. 1607 2 HARTMAN & HARTMAN 510 W. Plumb Lane, Suite B 3 Reno, NV 89509 4 T: (775) 324-2800 F: (775) 324-1818 5 notices@bankruptcyreno.com Attorney for Christina Lovato, Trustee 6 7 UNITED STATES BANKRUPTCY COURT 8 9 In re 10 META MATERIALS INC., 11 Debtor. 12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

DISTRICT OF NEVADA

Case No.: 24-50792-hlb (Chapter 7)

FIRST AMENDED DECLARATION OF JAMES W. CHRISTIAN IN SUPPORT OF **APPLICATION BY CHAPTER 7** TRUSTEE TO EMPLOY THE LAW FIRM OF CHRISTIAN ATTAR AS SPECIAL COUNSEL [F.R.BANKR.P. 2014]

Hearing Date: N/A Hearing Time:

James W. Christian, under penalty of perjury of the laws of the United States, declares:

- I am a resident of Texas, and I am a member in good standing with the State Bar of 1. Texas since 1978. My C.V. is attached hereto as Exhibit "A".
  - 2. I have personal knowledge of the matters stated herein.
- 3. I am the senior partner in the law firm of Christian Attar ("Christian Attar"), located in Houston, Texas. Christian Attar does not hold any interest adverse to the Meta Materials, Inc. chapter 7 estate ("Estate"), or any of its related subsidiaries.
- 4. To the best of my knowledge, there are no connections which Christian Attar, and/or any of its employees, have with the Estate's creditors, shareholder or other parties-ininterest and their respective attorneys and accountants, the United States Trustee, and any person employed in the office of the United States Trustee, related to this matter.

- 5. Since my Declaration executed on October 31, 2024, [ECF No. 99], I was asked by Next Bridge Hydrocarbon, Inc. ("Next Bridge") to defend it against numerous pro se lawsuits filed in the Western District of Texas (the "Pro Se Cases"). A list of the Pro Se Cases are as follows:
  - Case No. 24-cv-00317-DC-RG Contique Willcot v. Securities and Exchange Commission, et al; In the United States District Court Western District of Texas Midland-Odessa Division
  - Case No. 7:24-CV-321-DC-RCG; Danielle Spears v. Next Bridge Hydrocarbons, Inc., et al; In the United States District Court Western District of Texas Midland-Odessa Division
  - Case No. 7:24-CV-322; Matthew J. Pease v. Securities & Exchange Commission, et al; In the United States District Court for the District of Western Texas
- 6. In addition, the same group of collective pro se plaintiffs have filed numerous other pro se lawsuits (the Other Pro Se Lawsuits) in which Christian Attar is not involved. The point being it is important for the Court to understand the scope and intent of what the pro se plaintiffs have done to harm Meta. Some of the Other Pro Se Lawsuits have been filed but not served. *See* Exhibit "B" attached hereto.
- 7. It is my belief that the Pro Se Cases and the Other Pro Se Lawsuits are a coordinated effort to obstruct the efforts of the Bankruptcy Estate to hold accountable all parties who previously manipulated the securities of Meta Materials, Inc. ("Meta"). This includes many of the Pro Se Cases suing former officers and/or directors of Meta.<sup>1</sup>
- 8. The full factual analysis that act as a basis of my belief that the Pro Se Cases are a coordinated effort, is more fully set forth in my letter to Trustee's counsel, Jeffrey Hartman dated April 16, 2025, attached as Exhibit "D" (including all exhibits therein) (hereinafter the "Letter").

<sup>&</sup>lt;sup>1</sup> Note that in some Pro Se Cases notice of bankruptcy has been filed due to the automatic stay in place. *See* Exhibit "C" attached hereto.

- 9. As stated in the Letter, I did not (and still do not) believe Christian Attar's representation of Next Bridge in the Pro Se Cases was a conflict or caused me to cease to be disinterested. However, after further consideration, I have decided to withdraw from representing Next Bridge in the Pro Se Cases as I do not want this onslaught of the Pro Se Cases (and my involvement therein) to continue to harass the office of the Trustee, Christina Lavato, and more importantly this Honorable court, the Honorable Hilary L. Barness presiding.
- 10. Lastly, as set forth in the Letter, our firm will be filing a case ("New Case") on behalf of Next Bridge against certain defendants alleging tortious interference with the Orogrande Lease, certain existing and potential relations of Next Bridge and related claims.
- 11. The New Case will be on behalf of Next Bridge only and has nothing to do with, and is in no way related to Meta, the Bankruptcy Estate or otherwise.
- 12. As such, there is no conflict for the Christian Attar firm and its attorneys to handle the New Case.
- 13. Accordingly, once the New Case is filed on behalf of Next Bridge, Christian Attar will still remain disinterested persons (within the meaning of 11 U.S.C. § 101(14) and 327 and 328).

DATED: April 23, 2025.

CHRISTIAN ATTAR

James W. Christian, Esq.